## UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

DRYWALL ACOUSTIC LATHING AND INSULATION LOCAL 675 PENSION	) Civil Action No. 1:05-cv-00294-KAJ
FUND, Individually and On Behalf of All	) <u>CLASS ACTION</u>
Others Similarly Situated,	) )
Plaintiff,	)
VS.	) )
MOLSON COORS BREWING COMPANY, et al.,	) ) )
Defendants.	) )
	)

[Caption continued on following page.]

DECLARATION OF CARMELLA P. KEENER, ESQUIRE IN SUPPORT OF THE PLUMBERS & PIPEFITTERS NATIONAL PENSION FUND'S OPPOSITION TO MOTION OF THE MOLSON COORS INVESTORS GROUP FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND FOR APPROVAL OF ITS SELECTION OF LEAD COUNSEL

BRENT W. KLOS, Individually and On Behalf) of All Others Similarly Situated,	Civil Action No. 1:05-cv-00317-KAJ  CLASS ACTION
Plaintiff,	<u>CERSO NOTON</u>
vs.	
MOLSON COORS BREWING COMPANY, ) et al.,	
Defendants. )	
DAVID SILVER, Individually and On Behalf ) of All Others Similarly Situated,	Civil Action No. 1:05-cv-00324-KAJ
)	CLASS ACTION
Plaintiff,	
vs.	
MOLSON COORS BREWING COMPANY, ) et al.,	
Defendants. )	

- I, Carmella P. Keener, declare as follows:
- I am a member of the bar for the State of Delaware and of the law firm of 1. Rosenthal, Monhait, Gross & Goddess, P.A., proposed liaison counsel for plaintiff and the class.
- 2. I make this supplemental declaration in support of the Plumbers & Pipefitters National Pension Fund's Opposition to Motion of the Molson Coors Investors Group for Consolidation, Appointment as Lead Plaintiff and for Approval of Its Selection of Lead Counsel. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
- 3. Attached hereto as Exhibit A is a true and correct copy of *In re Williams Sec.* Litig., No. 02-CV-72-H(M), Order (N.D. Okla. July 8, 2002).
- 4. Attached hereto as Exhibit B is a true and correct copy of In re Daimler Chrysler AG Sec. Litig., No. 00-993, Declaration of Rolf Sturner (D. Del. Jan. 8, 2003).

I declare under penalty of perjury under the laws of the State of Delaware that the foregoing is true and correct. Executed this 26th day of July, 2005, at Wilmington, Delaware.

## /s/ CARMELLA P. KEENER

CARMELLA P. KEENER (#2810) ROSENTHAL, MONHAIT, GROSS & GODDESS, P.A. Citizens Bank Center, Suite 1401 919 North Market Street Wilmington, DE 19801 302/656-4433 ckeener@rmgglaw.com

[Proposed] Liaison Counsel

## **CERTIFICATE OF SERVICE**

I, Carmella P. Keener, hereby certify that on this 26th day of July, 2005, I electronically filed DECLARATION OF CARMELLA P. KEENER, ESQUIRE IN SUPPORT OF THE PLUMBERS & PIPEFITTERS NATIONAL PENSION FUND'S OPPOSITION TO MOTION OF THE MOLSON COORS INVESTORS GROUP FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND FOR APPROVAL OF ITS SELECTION OF LEAD COUNSEL with the Clerk of the Court using CM/ECF, which will send notification of such filing to the following:

John D. Hendershot, Esquire Richards, Layton & Finger One Rodney Square P.O. Box 551 Wilmington, DE 19899

Seth D. Rigrodsky, Esquire Ralph D. Sianni, Esquire Brian D. Long, Esquire Milberg Weiss Bershad & Schulman LLP 919 N. Market Street, Suite 441 Wilmington, DE 19801

Paul A. Fioravanti, Jr. Prickett, Jones & Eliott, P.A. 1301 King Street, P.O. Box 1328 Wilmington, DE 19899

In addition, the undersigned counsel has caused copies of the foregoing documents to be electronically sent to the following:

Charles J. Piven, Esquire Law Offices of Charles J. Piven, P.A. The World Trade Center-Baltimore 401 E. Pratt Street, Suite 2525 Baltimore, MD 21202

Elise J. Cohen, Esquire Lerach Coughlin Stoia Geller Rudman & Robbins LLP 9601 Wilshire Blvd., Suite 510 Los Angeles, CA 90210

Michael A. Swik, Esquire Law Offices of Michael A. Swick, PLLC One Williams Street, Suite 900 New York, NY 10004

William S. Lerach, Esquire Darren J. Robbins, Esquire Robbins LLP 401 B Street, Suite 1600 San Diego, CA 92101

Steven G. Schulman, Esquire Peter E. Seidman, Esquire Andrei V. Rado Milberg Weiss Bershad & Schulman LLP One Pennsylvania Plaza New York, NY 10119

Marc A. Topaz, Esquire Richard A. Miniskas, Esquire Tamara Skvirsky, Esquire Schiffrin & Barroway, LLP 280 King of Prussia Road Radnor, PA 19087

Stephen A. Weiss, Esquire Eric T. Chaffin, Esquire Seeger Weiss LLP 1 William Street New York, NY 10014-2502 Eric Belfi, Esquire Murray, Frank & Sailer LLP 275 Madison Avenue, Suite 801 New York, NY 10016

## /s/ Carmella P. Keener

Carmella P. Keener (DSBA No. 2810)
Rosenthal, Monhait, Gross & Goddess, P.A.
919 N. Market Street, Suite 1401
Wilmington, DE 19801
(302) 656-4433
ckeener@rmgglaw.com